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To: <commentletters@waterboards.ca.gov>
Date: Thu, Jun 14, 2007 11:24 AM
Subject: "Comment Letter - Suction Dredge Mining"

6/12/07 Workshop
Suction Dredge Mining
Deadline: 6/22/07 Noon

Assembly Bill 1032 should not become a law.

The California Department of Fish and Game (1997) described typical dredging activities as follows' "An individual suction dredge operation affects a relatively small portion of a stream or river. A recreational suction dredger (representing 90-percent of all dredgers) may spend a total of four to eight hours per day in the water dredging an area of 1 to 10 square meters. The average number of hours is 5.6 hours per day. The remaining time is spent working on equipment and processing dredged material. The area or length of river or streambed worked by a single suction dredger, as compared to total river length, is relatively small compared to the total available area."



Dredge mining had little, if any, impact on water temperature (Hassler, T.J., W.L. Somer and G.R. Stern, 1986). In addition, the Oregon Siskiyou Dredge Study states, "There is no evidence that suction dredging affects stream temperature" (SNF, 2001).

In the Oregon Siskiyou National Forest Dredge Study, Chapter 4, Environmental Consequences, some perspective is given to small-scale mining "The average claim size is 20 acres. The total acreage of all analyzed claims related to the total acres of watershed is about 0.2 percent. The average stream width reflected in the analysis is about 20 feet or less and the average mining claim is 1320 feet in length. The percentage of land area within riparian zones on the Siskiyou National Forest occupied by mining claims is estimated to be only 0.1 percent." The report goes on to say, "Over the past 10 years, approximately 200 suction dredge operators per season operate on the Siskiyou National Forest" (SNF, 2001).

A report from the U.S. Forest Service, Siskiyou National Forest (Cooley, 1995) answered the frequently asked question, "How much material is moved by annual mining suction dredge activities and how much does this figure compare with the natural movement of such materials by surface erosion and mass movement?" The answer was that suction dredges moved a total of 2,413 cubic yards for the season. Cooley (1995) used the most conservative values and estimated that the Siskiyou National Forest would move 331,000 cubic yards of material each year from natural causes. Compared to the 2413 (in-stream) cubic yards re-located by suction mining operations the movement rate by suction dredge mining would equal about 0.7% of natural rates.

THE REAL ISSUE

The issue against suction dredge operations in the streams of the United States appears to be less an issue of environmental protection and more of an issue of certain organized individuals and groups being unwilling to share the outdoors with others without like interests.

Suction dredges do not add pollution to the aquatic environment. They merely re-suspend and re-locate the bottom materials (overburden) within the river or stream.

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